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Attorney for Defendant TANYA RODRIGUEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR12 0119 SI

Plaintiff,

v.

JOSEPH ORTIZ, et al.,

Defendant.

**STIPULATION AND ~~PROPOSED~~
ORDER PERMITTING HEATHER
HARDWICK AND MAX KWAN-
ROSENBUSH, AND TIM FINNEGAN TO
REVIEW MATERIALS SUBJECT TO
PROTECTIVE ORDER**

The protective order in this case prohibits persons other than counsel and defendants from accessing certain protected material (the “subject material”). The order provides that further court order is required before non-designated persons can access subject material. *See*, Docket #243. This stipulation seeks authorization from the Court to allow Max Kwan-Rosenbush, Heather Hardwick and Tim Finnegan to access the materials subject to protective order in this case. Their specific contributions to the case and reasons necessary for access to the subject materials are set out below.

1. Heather Hardwick is a licensed California attorney with experience in conducting document reviews on state and federal cases. Max Kwan-Rosenbush is a paralegal with extensive experience in litigation support and document review. Both individuals will be assisting CJA defense counsel in document review and review of wiretap conversations, line

1 sheets, and transcripts, and summarization of these materials, to assist in the trial and motion
2 preparation for the *Ortiz* case. Counsel Robert Waggener and other CJA counsel will be
3 supervising this review and summarization process.

4 2. Tim Finnegan is a licensed California attorney who is a research and writing
5 specialist. Mr. Finnegan will be providing wiretap motion research and writing on behalf of all
6 CJA counsel in this case.

7 **IT IS HEREBY STIPULATED** by the parties that:

8 4. Heather Hardwick, Max Kwan-Rosenbush, and Tim Finnegan should be
9 permitted to view and access the protected subject material in this case.

10
11 **STIPULATED AND AGREED TO.**

12
13
14 Dated: September 28, 2012

/s/

15 ROBERT WAGGENER
16 Attorney for Defendant
TANYA RODRIGUEZ

17 Dated: September 28, 2012

/s/

18 ACADIA SENESE
19 Assistant United States Attorney

20 **IT IS SO ORDERED.**

21 Dated: September 28, 2012

22 
23 ~~SUSAN ILLSTON~~ LAUREL BEELER
24 United States District Judge
25 Magistrate